

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

b42

GREGORY J. LAUREANNO,  
Plaintiff

v.

DEATON, INC. AND  
THEODORE WILLIAM BACALIS,  
Defendants

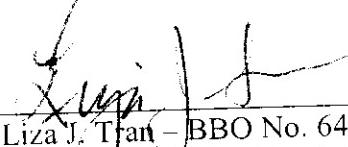
CIVIL ACTION  
NO. 04 11592 RCL

**JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINES**

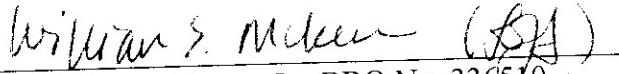
Now come the parties in the above-entitled action and move jointly for a two-week extension for the defendants to answer the plaintiff's discovery requests, including plaintiff's request for interrogatories, documents and admissions. In support of this motion, the parties state that they have engaged in discovery and are cooperating in good faith but that additional time beyond the deadline of October 29, 2004 will be required to complete defendant's discovery responses. The parties state that this extension will not result in a delay of the scheduling conference currently scheduled for December 2, 2004.

WHEREFORE, the parties jointly move to extend the deadlines for the defendant to respond to the plaintiff's discovery requests from October 29, 2004 to November 12, 2004.

Defendants, Deaton, Inc. and Theodore W. Bacalis  
By their Attorneys,

  
Liza J. Tuan - BBO No. 646818  
Sugarman, Rogers, Barshak & Cohen, P.C.  
101 Merrimac Street, 9<sup>th</sup> Floor  
Boston, MA 02114-4737  
(617) 227-3030

Plaintiff, Gregory J. Laureanno  
By his Attorney,

  
William E. McKeon, Jr., BBO No. 336510  
10 North Main Street  
Fall River, Massachusetts 02720  
(508) 677-4424

DATED: October 27, 2004

355626